

(US 5,913,214) in view of Iizuka et al (US 6,424,980) and Bates et al (US 6,873,982) and Jammes et al. (US 6,484,149). Applicant respectfully traverses these rejections.

Regarding **Claim 1**, the “first document” of Bates cited in the Office Action is not provided “directly to a user”, nor is it “extracted”, nor is it a “data log”. As such, the Applicant respectfully submits that the combination of Madnick, Iikuza, and Bates does not teach or suggest the limitation of “providing the extracted data from the determined web domain address in a data log directly to a user” as is recited in Claim 1. Further explanation of this issue is as follows:

The Office Action dated May 10, 2007 states that Madnick alone does not teach the above limitation, stating, “Madnick does not explicitly teach the claimed limitation... ‘in data log directly to the user’” (see page 5, lines 16-17). The Applicant agrees. The Office Action then relies on Bates for at least suggesting, in view of Madnick, this limitation by stating on page 5, lines 20-22,

Bates teaches storing extracted documents as results in result cache and returning first document as a first result from the result cache directly to a user (fig. 10, col. 11, lines 60-67; col. 12, lines 1-27)

Based on this statement in the Office Action, the “first document” of Bates is being equated to the claimed “extracted data from the determined web domain address”. However, this ‘first document’ in Bates is not “directly provided to a user” as is claimed for the “extracted data” of Claim 1. Instead, it is stored in a cache after multiple other documents are constructed (see col. 12, lines 23-25 of Bates). Storing the document in the cache after waiting for other documents to be constructed, as is done in Bates, is not the same, nor does it suggest “providing extracted data from the determined web domain address... directly to a user” as claimed in Claim 1. Since the result cache represents an intermediate storage point for the transfer of the document in Bates, the handling of the “first document” cannot be considered to teach or suggest providing data “directly” to a user as claimed in Claim 1.

Furthermore, it is respectfully submitted that the “first document” is not equivalent or analogous to the claimed “extracted data from the determined web domain address”. It is also not equivalent or analogous to the extracted data of Madnick. In the context of Bates, the cited “first document” is neither ‘extracted’ nor does it contain data “from the determined web domain

Further for **Claim 1**, adding the “document” type of output from Bates to the system of Madnick would result in a “document centric” form of data retrieval for the combined system. This would cause the system of Madnick to be rendered unsatisfactory for its intended purpose. Per MPEP 2143.01, the Applicant respectfully submits that there is no proper suggestion or motivation to make the proposed modification. Further explanation of this issue is as follows:

As discussed above, Bates teaches sending a document to a user as an initial result of a search (col. 12, lines 25-26). As also noted above, these documents contain links to other documents by embedding a script that implements the function of initiating navigation to a document of a record from a result set (see col. 10, lines 53-61 and col. 12, lines 16-19 of Bates). Clearly, the user in the system of Bates is presented with a document (col. 12, lines 25-26). However, Madnick specifically teaches away from “document centric” data retrieval, calling such a form of search response as “useless to the requesting user” (col. 1, lines 51-67). Instead, Madnick states that searches access multiple data sources to generate an “answer”, not a “list of documents that may or may not contain an answer the user is seeking” (col. 1, lines 65-67; col. 15, lines 24-25). The system of Madnick returns extracted data (col. 2, lines 40-41). Accordingly, to provide the search output style of Bates as part of the search output system of Madnick would change the principle of operation of the system of Madnick. Per MPEP 2143.02, there is no suggestion or motivation to make the proposed modification, including that which has been presented in the Office Action. For at least this reason, it is respectfully submitted that Madnick cannot be properly combined with Bates to render obvious the claimed limitation and the rejection based thereon should be withdrawn.

This argument also applies to the grounds of rejection cited with regards to similar limitations in Claims 11, 17, 27, and 34. For at least the above reasons, it is respectfully submitted that Claims 1, 11, 17, 27, and 34 are allowable over the presently applied prior art. Accordingly, the Applicant respectfully requests that the rejections of Claims 1, 11, 17, 27, and 34 be withdrawn.

Further regarding **Claim 1**, adding the user input interface cited in Iizuka to be the source of 'commands' in Madnick would cause a user to enter two inputs to access different types of data sources. This would change a main principle of operation of Madnick. Per MPEP 2143.02, the Applicant respectfully submits that this is not sufficient to render the claims *prima facie* obvious. Further explanation of this issue is as follows:

Step (a) of the method of Claim 1 includes the limitation "enabling a database-structured query with at least one fundamental clause to be generated by a user". Page 4, lines 20-21 of the Final Office Action includes the statement, "The command is represented as the database-structured query that is not generated by the user". This statement illustrates two concepts: (1) that the 'database-structured query' of the invention as claimed in Claim 1 is being equated in the rejection with a "command" of Madnick and (2) this "command" of Madnick is not generated by a user. The Applicant agrees with at least the latter concept. Step (c) of the method of Claim 1 further includes the limitation "performing the database-structured query upon the retrieved non-database structured arrangement of data". Clearly, this limitation refers to the same "database-structured query" as listed in step (a). The Office Action relies upon Madnick as anticipating this limitation of step (c). Specifically, the statement is made on page 5, lines 8-9 of the Office Action that "Those commands are used and data is extracted from the data source". Again, the "commands" of Madnick are equated in the Final Office Action with the "database-structured query". However, as noted above, these commands are not generated by a user, as required by step (a) of Claim 1. The Office Action concurs with this statement, noting "Madnick does not explicitly teach the claimed limitation 'with at least one fundamental clause generated by a user'" on page 5, lines 16-17.

The Office Action then proceeds to rely on Iizuka to teach or suggest this limitation, stating on page 5, lines 18-19, "Iizuka teaches the user interface unit receives a search request (query statement) consisting of search terms and search condition (col. 13, lines 35-40)". The proposed modification regarding Iizuka is listed on page 6 of the Final Office Action as,

It would have been obvious to a person of ordinary skill in the art at the time the invention was made to apply Iizuka's teaching user interface unit receives a search request (query statement) consisting of search terms and search condition ... to Madnick's system.

This is understood to mean that the modification would include applying the system or concept of the user interface unit of Iizuka as part of the input system of Madnick. In the context of the present rejection, this would involve making the “commands” of Madnick to be “generated by a user”, per the teachings of Iizuka. However, this would expressly change a principle of operation for the system of Madnick.

The teachings of Madnick specifically eliminate this exact scenario of user input. The system of Madnick queries both structured and semi-structured data sources, accessing the latter in a way that is transparent to a user (see col. 2, lines 41-45; col. 15, lines 49-53). To receive a separate input from a user interface unit for the web page data sources would disrupt this ‘transparent’ interaction by involving two inputs from a user – one in a “structured query language” for structured data sources and one of a “command” format for semi-structured data sources. Seamless access of HTML files with phrases formatted in a structured query language – not a command format – is one of the benefits and primary functions of the system of Madnick (col. 15, lines 49-53). The illustration of Figure 6 of Madnick would be substantially altered by the proposed modification, since it would eliminate the need for wrapper generator (614), due to the fact that direct user input would be issued directly to the World Wide Web pages 612, 612’, 612” without additional processing (see col. 9, lines 38-44 of Madnick). This would be a significant change to the principle of operation of the system of Madnick. Per MPEP 2143,02, it is respectfully submitted that the teachings of Iizuka in view of Madnick are not sufficient to render the claims *prima facie* obvious.

This argument also applies to the similar limitations of Claim 34. For at least the above reasons, it is respectfully submitted that Claims 1, 17, and 34 are allowable over the presently applied prior art. Accordingly, the Applicant respectfully requests that the rejections of Claims 1, 17, and 34 be withdrawn.

Further regarding **Claim 1**, no motivation is provided in the Office Action for combining the teachings of Iizuka with the teachings of Madnick. Motivation is provided in regards to the applied teachings of Bates, but not the secondary reference of Iizuka. A proper rejection under 35 U.S.C. 103 should include an explanation why one of ordinary skill in the art at the time the invention was

made would have been motivated to make the proposed modification, per MPEP 706.02(j). Since an explanation for combining the teachings of Iizuka with those of Madnick is absent from the present Office Action, it is respectfully submitted that the present rejection of Claim 1 does not establish a case of *prima facie* obviousness with regards to Claim 1. Further explanation of this issue is as follows:

On page 6, lines 1-8, the Office Action states,

"It would have been obvious to a person of ordinary skill in the art at the time the invention was made to apply Iizuka's teaching user interface unit received a search request (query statement) consisting of search terms and search condition... to Madnick's system in order to provide a result to a user quickly after retrieving data from a plurality of semi-structured document via open network without need a lot of time and labor to design and manage".

Clearly, the basis of this cited motivation is "to provide a result quickly". However, the part of the system of Iizuka relied upon in the rejection involves an input system, or "user interface unit". Such an input unit would not be involved with the cited motivation of "provide a result to a user quickly", since it is involved with the input, not the output. As such, the Office Action does not include an explanation for the proposed modification of combining Madnick with the teachings of Iizuka. Accordingly, the Applicant respectfully submits that such a rejection does not establish a case of *prima facie* obviousness with respect to the invention as claimed in Claim 1.

This argument also applies to the grounds of rejection cited against the similar limitations of Claims 17 and 34. For at least the above reasons, it is respectfully submitted that Claims 1, 17, and 34 are allowable over the presently applied prior art. Accordingly, the Applicant respectfully requests that the rejections of Claims 1, 17, and 34 be withdrawn.

Further regarding **Claim 1**, Madnick does not suffer from any of the sources of problems listed in the prior art description of Iizuka. Therefore, the motivation statement is not valid because the problems with the prior art in Iizuka do not apply to the teachings of Madnick. The Applicant respectfully submits that no proper motivation has been provided for combining the teachings of Madnick with those of Bates and Iizuka, and *prima facie* obviousness has not been established. Further explanation of this issue is as follows:

This argument also applies to the grounds of rejection cited against the similar limitations of Claims 17 and 34. For at least the above reasons, it is respectfully submitted that Claims 1, 17, and 34 are allowable over the presently applied prior art. Accordingly, the Applicant respectfully requests that the rejections of Claims 1, 17, and 34 be withdrawn.

Further regarding **Claim 1**, the motivation statement provided in the Office Action conflicts with the teachings of Bates and Iizuka. As such, the Applicant respectfully submits that proper motivation has not been provided for combining the teachings of Madnick with those of Bates and Iizuka and *prima facie* obviousness has not been established for the present invention as claimed in Claim 1. Further explanation of this issue is as follows:

The Office Action stated the motivation for combining the references as “to provide a result quickly to a user after retrieving data from a plurality of semi-structured document via open network without need a lot of time and labor to design and manage” (Office Action page 6, lines 1-8). However, the cited teachings of Bates and Iizuka explicitly contradict this motivation. Since the cited “documents” Bates are first stored in a result cache after all other documents are generated, they do not “provide a result quickly to a user after retrieving data” (see col. 12, lines 16-26 of Bates). Since the “document” of Bates provides links that require further action from a user to get to a result and do not provide the result itself, they also cannot be considered to “provide a result quickly to a user” (see col. 10, lines 57-61 of Bates). Finally, as discussed above, the addition of the user interface unit of Iizuka (col. 13, lines 35-37) to generate the commands of Madnick (col. 9, lines 57-65), would involve additional steps and user input, along with the initial structured query of Madnick (col. 9, lines 25-41). Madnick specifically states that such an implementation would require users “to learn a specialized query language for accessing web pages”, which “would defeat the purpose of the ‘intranet’ and would be virtually impossible on the Internet” (col. 2, lines 20-24). Clearly, such a combination of Iizuka with Madnick would not be “without need a lot of time and labor to design and manage” since such a combination would at least require additional time and labor to learn and enter commands. As such, this motivation statement does not correspond to either of the applied teachings of Bates or Iizuka. Accordingly, the Applicant respectfully submits that this motivation does not suffice to establish *prima facie* obviousness under 35 U.S.C. 103.

This argument also applies to the grounds of rejection cited against the similar limitations of Claims 11, 17, 27, and 34. For at least the above reasons, it is respectfully submitted that Claims 1, 11, 17, 27, and 34 are allowable over the presently applied prior art. Accordingly, the Applicant respectfully requests that the rejections of Claims 1, 11, 17, 27, and 34 be withdrawn.

Regarding **Claim 23**, the cited portion of Madnick, col. 15, lines 25-35, does not teach or suggest a “web crawler”. As such, the claim limitation “wherein the data extraction engine is a web crawler” is not taught or suggested by the combination of Madnick in view of Iizuka and Bates. Further explanation is as follows:

The Office Action cites col. 15, lines 25-35 of Madnick as anticipating “wherein the data extraction engine is a web crawler”. However, no discernable reference, explicit or otherwise is included in this cited passage for referring to a “web crawler”. In fact, the basic operation of a “web crawler” would be rather contradictory to the teachings of Madnick. For example, all of the data sources (104) “must” be registered before being accessed, and thus, the contents and locations of actual data are predetermined by virtue of this registering (see col. 10, lines 14-24 of Madnick). This is quite contrary to the basic operating principle of a web crawler, wherein a seed URL is known, not the locations of all sources of data. Regardless, Madnick does not teach or suggest such a limitation. Madnick considered in view of the teachings of Bates and Iizuka does not cure this deficiency.

For at least the above reasons, it is respectfully submitted that Claim 23 is allowable over the presently applied prior art. Accordingly, the Applicant respectfully requests that the rejections of Claim 23 be withdrawn.

Regarding **Claims 24 and 26**, the web pages in the cited portion of Madnick, col. 9, line 55 – col. 10, line 5, does not include any reference to “web domain address further comprising at least one link address” as part of any interconnection between web pages 612, 612’, and 612”. Accordingly, neither the limitation of, “wherein the web domain address further comprises at least one link address” in Claim 24, nor the similar limitation in Claim 26, are neither taught by Madnick or suggested by the combination of Madnick in view of Bates and Iizuka. Further explanation is as follows:

The cited portion of Madnick includes multiple data sources 104 that are web pages (612, 612’, and 612”). However, no interconnection between these web pages is specified in the disclosure of Madnick, including one that would further involve a relationship via a link address. As such, none of these pages can be properly interpreted or associated with the claimed “at least one link address”. “Link” information, as opposed to “URL” information, is also lacking from Table 2 of Madnick. The URLs in the descriptor files of Madnick are not “links” in the context of Madnick – they are just additional addresses. The registering of the data sources in the system of Madnick, as discussed in more detail above (col. 10, lines 20-24 of Madnick), eliminates the need for links in

the actual data sources of Madnick. The inclusion of the additional teachings of Bates and Iizuka do not cure this deficiency. It is respectfully submitted that a *prima facie* case of obviousness has not been established for Claims 24 and 26 for at least this reason.

For at least the above reasons, it is respectfully submitted that Claims 24 and 26 are allowable over the presently applied prior art. Accordingly, the Applicant respectfully requests that the rejections of Claims 24 and 26 be withdrawn.

Regarding **Claim 34**, no modification statement is provided in the Office Action for combining the teachings of Bates with the teachings of Madnick. A proper rejection under 35 U.S.C. 103 should include the proposed modification of the applied references necessary to arrive at the claimed subject matter and an explanation why one of ordinary skill in the art at the time the invention was made would have been motivated to make the proposed modification, per MPEP 706.02(j). Since no modification statement is provided that involves the reference of Bates, it is respectfully submitted that the present rejection of Claim 1 does not establish a case of *prima facie* obviousness with regards to Claim 34. Further explanation of this issue is as follows:

On page 13, lines 1-8, the Office Action states,

“It would have been obvious to a person of ordinary skill in the art at the time the invention was made to apply Iizuka’s teaching outputting the search result in a prescribed single format that is specific to each user. In particularly, converting the search result into the item presentation styles of each user according to the style conversion data Iizuka’s teaching of the apparatus returns directly the search result to a user via a user interface unit 11 to Madnick’s system in order to provide a result to a user quickly after retrieving data from a plurality of semi-structured document via open network without need a lot of time and labor to design and manage, to retrieve data contained in a plurality of semi-structured documents over open networks quickly, eliminate traffic when server receives multiple user’s request from at the same time and to provide a good view of a search result to a user’s system for easily viewing”.

Clearly, this statement does not refer to Bates or systems or teachings of Bates. As such, the Office Action does not include the proposed modification of the involved references necessary to arrive at the claimed subject matter. Accordingly, the Applicant respectfully submits that such a rejection does not establish a case of *prima facie* obviousness with respect to the invention as claimed in Claim 34 and should be withdrawn.

Regarding **Claim 4**, the motivation statement provided in the Office Action is not derived from one of the three possible sources of suggestion or motivation. As such, the Applicant respectfully submits that no proper motivation has been provided for combining the teachings of Hennings with those of Bates and Iizuka and Madnick, and *prima facie* obviousness has not been established. Further explanation of this issue is as follows:

The three possible sources of a motivation to combine the references are the nature of the problem to be solved, the teachings of the prior art, and the knowledge of persons of ordinary skill in the art (MPEP 2143.01). The Office Action stated the motivation for combining the references as "... in order to retrieve a relevant information corresponding to a user's request correctly and quickly" (Office Action page 14, lines 9-12). However, this statement is not derived from any of the three possible sources of motivation. If it is derived from one of these three possible sources, such a derivation is not clearly evident from the written record, nor is not evident from the context of the discussed problems to be solved or the teachings of the cited prior art. If this motivation statement is based on the knowledge of persons of ordinary skill in the art, then it should be noted that it is not appropriate to rely solely on common knowledge in the art without evidentiary support in the record as the principal evidence upon which a rejection was based, per MPEP 2144.03. Accordingly, the Applicant respectfully submits that this motivation does not suffice to establish a case of *prima facie* obviousness as is necessary for a rejection under 35 U.S.C. 103 for the limitations of Claim 4.

The above argument also applies to the motivation statement cited with regards to the similar limitations of Claims 14, 25, and 35. For at least the above reasons, it is respectfully submitted that Claims 4, 14, 25, and 35 are allowable over the presently applied prior art. Accordingly, the Applicant respectfully requests that the rejections of Claims 4, 14, 25, and 35 be withdrawn.

Regarding **Claim 4**, the "following links" of Hennings conflicts with the concept of "registered data sources" in the system of Madnick. As such, the proposed modification in the Office Action of adding the following links teaching of Henning to the data retrieval process of

Madnick would greatly change the operating principle of the system of Madnick. Per MPEP 2143.01, the Applicant respectfully submits that these teachings of Hennings in view of Madnick, Bates, and Iizuka are not sufficient to render Claim 4 *prima facie* obvious. Further explanation of this issue is as follows:

The Office Action acknowledges that Madnick does not teach the limitation, “following links contained within the web domain until the links have been exhausted or following the links until a predetermined limit is reached” (page 14, lines 4-6). The applicant agrees. The Office Action attempts to remedy this lack of anticipation by relying on Hennings, stating that “Hennings teaches following the links until the Caribbean.htm is reached” (page 14, lines 6-7). The motivation provided for adding such a capability to Madnick is listed as “in order to retrieve a relevant information corresponding to a user’s request correctly and quickly”. However, both this modification and motivation conflict with the explicit teachings of Madnick. The sources of data in Madnick are required to be registered, which involves the creation of a descriptor file (col. 10, lines 12-18). This descriptor file includes information about a source, including “what data elements are available from the source” and “an address for the actual source of the data” (col. 10, lines 24-31). Registered web page sources also include a specification file that lists commands that “must be issued” in order to interact with the web pages (col. 12, lines 5-11). However, adding a “follow link” ability, such as that alleged to be taught by Hennings, would involve the premise that an address for the actual source of data is not already known (hence, the need to follow links). This expressly contradicts the teachings of Madnick cited above in columns 10 and 12, which state that such locations are already known (and thus, following links is not necessary). Also, if links were followed by the system of Madnick, then by Madnick’s own teachings, the command transmitter of Madnick would not have a list of the commands to issue in order to interact with the linked web page (col. 10, lines 24-31). Again, the operation of the system of Madnick requires a predetermined amount of knowledge about a data source, which is obtained through registering the data sources. “Following links” operates on undetermined data sources, but this lack of information would prevent the system of Madnick from functioning properly. As such, the proposed modification of Madnick in view of Hennings would greatly change a fundamental principle of operation of

Madnick. Per MPEP 2143.01, the Applicant respectfully submits that the teachings of Madnick in view of Bates, Iizuka, and Hennings are insufficient to render the Claim 4 *prima facie* obvious.

This argument also applies to the grounds of rejection cited against the similar limitations of Claims 14, 25, and 35. For at least the above reasons, it is respectfully submitted that Claims 4, 14, 25, and 35 are allowable over the presently applied prior art. Accordingly, the Applicant respectfully requests that the rejections of Claims 4, 14, 25, and 35 be withdrawn.

Regarding **Claim 36**, Hennings does not show “parsing” in relation to Figure 1B. Accordingly, the applicant respectfully submits that all claim limitations are not taught or suggested by the applied references of Madnick in view of Iizuka, Bates, and Hennings. Further explanation is as follows:

Claim 36 recites the limitation, “further parsing the data of webpages determined by the links included on the webpage”. The Office Action admits that Madnick does not explicitly teach this limitation, but relies on Hennings to at least suggest this limitation in view of Madnick. The Office Action states, “parsing data as shown in fig. 1B to determine links included on the web page (fig. 8)”. However, Figure 1B, and its associated description do not teach or suggest any form of “parsing” (see col. 4, lines 45-53 of Hennings). Figure 1B illustrates HTML of a web page and the concept of relative URLs. The text of the HTML is not involved in any form of “parsing”, even giving such a term its broadest reasonable interpretation in light of the presently submitted specification. The evaluation of a relative URL is not a form of ‘parsing’, nor is applied to “the data of the webpages determined by the links on the web page” since it involves considering the relative URL. The teachings and description of Figure 1B do not involve any form of the searching that is involved in Madnick. Further, there is no motivation or teaching in any of the references that would suggest “parsing” data on “webpages determined by the links” in the system of Madnick because the system of Madnick utilizes “an address for the actual source of data” and, therefore, would not need to follow links to find data for “further parsing”. Neither Bates nor Iizuka cures this deficiency in the teachings of Madnick and Hennings. Accordingly, the applicant respectfully

submits that the prior art references do not teach or suggest the all the claim limitations for at least this reason, and accordingly, a *prima facie* case of obviousness has not been established.

For at least the above reasons, it is respectfully submitted that Claim 36 is allowable over the presently applied prior art. Accordingly, the Applicant respectfully requests that the rejection of Claim 36 be withdrawn.

Regarding **Claim 8**, “Sedans” is not a “region of interest”. As such, the applicant’s respectfully submit that all limitations of the claimed invention have not been taught or suggested by taking Madnick in view of Bates, Iizuka, and Hennings. Further explanation is as follows:

Claim 8 recites the limitation, “reducing the retrieved data to a region of interest”. The Office Action states that Madnick does not teach or suggest this limitation (page 16, lines 16-19). The Applicant agrees. The Office Action further relies on Jammes as teaching this limitation, stating “Jammes teaches the claimed limitation ‘reducing the retrieved content to a region of interest’ as an HTML coded set result: web/sedans.html>Sedans</A. This information shows the system of reduced the retrieved content to a region of interest as Sedans (col. 22, lines 22-45)”. The applicant respectfully disagrees. First, nothing in the cited part of Jammes (col. 22, lines 22-45) refers to Sedans. As such, the basis of this rejection and interpretation of Jammes is unclear. Second, the references to “Sedans” in Jammes do not involve a “region” of interest. For example, Sedans are discussed in column 46, lines 18-65. This discussion, however, does not involve any “region of interest”. Instead, “Sedans” is listed as a “data record” (col. 46, lines 40-46). There is no “region” associated with these data records. Instead, this record is located based on a “Group_ID” 1816 of 60004 (col. 46, lines 27-31). This numerical reference to a “Group_ID” is not a form of the claimed “region of interest”, and as such, cannot be considered to read on the claimed “region of interest” which is a result of “reducing the retrieved content”. It is further noted that the “Sedans” data group is obtained from scanning a database (116) in Jammes (col. 46, lines 27-31). However, the “retrieved data” in Claim 8 is specifically “a non-database structured arrangement of data”, per the limitations of Claim 1. Clearly, the “database” structure of the source in Jammes is not the same or analogous to the “non-database arrangement of data” as presently claimed in Claim 8 in reference to its parent claim, Claim 1. Accordingly, the “database” derived teachings cannot be said to teach

or suggest the claimed limitation of Claim 8, nor can they be applied to the semi-structured data sources of Madnick. Neither Bates nor Iizuka cure this deficiency. The Applicant respectfully submits that not all of the claim limitations of Claim 8 have been taught or suggested by the applied references.

For at least the above reasons, it is respectfully submitted that Claim 8 is allowable over the presently applied prior art. Accordingly, the Applicant respectfully requests that the rejection of Claim 8 be withdrawn.

Regarding **Claim 28**, the commands of Madnick are not “parsed”. As such, the applicant’s respectfully submit that all limitations of the claimed invention have not been taught or suggested by taking Madnick in view of Bates. Further explanation is as follows:

Claim 28 recites the limitation “parsing the database-structured query to determine at least one link to search at the website”. The Office Action cites col. 12, lines 1-20 and Table 2 of Madnick as teaching this limitation (page 23, lines 18-20). While table includes a link, it does not teach or suggest the claimed “parsing the database-structured query to determine at least one link”. The URLs are listed in the table and are from a “specification file” (col. 12, line 4-9). They are not derived via “parsing” from the commands; they are predetermined in the specification file as part of a sequence of commands. No commands are parsed “to determine at least one link to search at the website”, since the addresses listed in the table are explicitly stated, and thus, don’t need to be “determined”. It is further noted that Table 2 of Madnick does not include “at least one link to be searched”. URLs, such as “quotes.galt.com” are listed, but they are not listed in a hyperlink format, nor do they refer to other URLs as links. As such, these URLs cannot be considered “at least one link”. Bates does not cure this deficiency. Accordingly, for at least the above reasons, Madnick in view of Bates does not teach or suggest all of the claimed limitations of Claim 28.

For at least the above reasons, it is respectfully submitted that Claim 28 is allowable over the presently applied prior art. Accordingly, the Applicant respectfully requests that the rejection of Claim 28 be withdrawn.

do not teach or suggest any form of “extraction” (see col. 15, lines 36-65 of Hennings). Figure 8 shows the promotion of data from a nested link. This data is not “extracted”, nor is it promoted “based in part on the database-structured query” as claimed. “Promotion” does not teach or suggest “extraction”. In fact, the transfer of contextual data cannot be extracted “based in part on the database-structured query” because there is no “database-structured query” taught or suggested by Hennings, including in reference to Figure 8. Accordingly, the data represented in Figure 8 is also not “processed as a searchable database” as further claimed in Claim 29, because there is no database-structured query with which to do the processing. This lack of a type of “extraction” or a “database-structured query” prevents the teachings of Hennings from teaching or suggesting all of the limitations of Claim 29 as claimed. It also prevents the application of teachings from Hennings to those of Madnick, since Madnick is generally based on data retrieval, but the teachings of Hennings involve data promotion. Bates does not cure this deficiency in the teachings of Madnick and Hennings. Accordingly, the applicant respectfully submits that the prior art references do not teach or suggest the all the claim limitations for at least this reason, and accordingly, a *prima facie* case of obviousness has not been established.

For at least the above reasons, it is respectfully submitted that Claim 29 is allowable over the presently applied prior art. Accordingly, the Applicant respectfully requests that the rejection of Claim 29 be withdrawn.

Regarding **Claim 43**, the binary file listed in Eckes is not a form of “extracted data” that “satisfies the query condition” as claimed. As such, the claimed invention has not been considered as a whole, which is required for a rejection under 35 U.S.C. 103, as is noted in MPEP 2141. Accordingly, the Applicant respectfully submits that a *prima facie* case of obviousness has not been established for Claim 43 for at least this reason. Further explanation is as follows:

Claim 43 recites the limitation, “the extracted data includes at least one binary file”. Claim 34, the parent claim of Claim 34 stipulates that this extracted data is data “that satisfies the query condition”. However, the downloading of a binary file in Eckes neither teaches nor suggests that this data transfer includes data that satisfies a query condition (see col. 2, lines 39-47). This means that the “binary file” of Eckes (which is noted as a graphics file) cannot be considered to teach the

claimed limitation of “extracted data”. Again, the limitations of Claim 43 have not been considered as a whole. As such, the teachings of Eckes, even when considered in view of the further teachings of Madnick in view of Iizuka and Bates, do not teach or suggest this limitation. It is further noted that the downloading of a binary file in Eckes is noted as causing a network “to lose throughput” (col. 2, line 40-41). This is the exact opposite of the cited motivation in the Office Action, “in order to allow faster retrievals and reduced resource consumption”, since this lower throughput is the result of one user utilizing all the resources to download the very large binary file, thereby also preventing other users the same amount of download capability. Accordingly, this motivation does not support the proposed modification.

For at least the above reasons, it is respectfully submitted that Claim 43 is allowable over the presently applied prior art. Accordingly, the Applicant respectfully requests that the rejection of Claim 43 be withdrawn.

Regarding **Claim 7**, Applicant holds that none of the prior art references, either alone or in combination, teach or suggest providing creating the database-structured query, further comprises, creating a conditional expression within the database-structured query describing where to start and stop to scan the data at the determined web domain address for the data to extract, as claimed, in part, by amended Claim 7.

Further, regarding **Claim 11**, Applicant holds that none of the prior art references, either alone or in combination, teach or suggest providing the extracted data from the web domain address to a tab delimited data file, as claimed, in part, by amended Claim 11 and similarly by amended Claim 17.

Further, regarding **Claim 12**, Applicant holds that none of the prior art references, either alone or in combination, teach or suggest the database-structured query, further comprises, a network address included within the database-structured query indicating a starting point to start to crawl the network, as claimed, in part, by amended Claim 12.

Further, regarding **Claim 13**, Applicant holds that none of the prior art references, either alone or in combination, teach or suggest the network address further comprises at least one

universal resource locator (URL) string generated by a sequence or list function, as claimed, in part, by amended Claim 13.

Further, regarding **Claim 16**, Applicant holds that none of the prior art references, either alone or in combination, teach or suggest the regular expression within the database-structured query, further defines where a scan would stop, as claimed, in part, by amended Claim 16.

Further, regarding **Claim 20**, Applicant holds that none of the prior art references, either alone or in combination, teach or suggest the regular expression within the database-structured query, further comprises, at least one symbol used to denote the part of the regular expression that a user desires to extract, as claimed, in part, by amended Claim 20.

Further, regarding **Claim 25**, Applicant holds that none of the prior art references, either alone or in combination, teach or suggest the web domain address further comprises at least one link address that is followed to locate data to extract until a user-specified number of links is reached, as claimed, in part, by amended Claim 25.

As such, Applicant respectfully submits that Claims 7, 11-13, 16, 20, and 25 are allowable over the prior art references.

Further, dependent Claims 2-10, 12-16, 18-26, 28-33, and 35-44 are at least allowable for the same reasons as amended independent Claims 1, 11, 17, 27, and 34 upon which they depend respectively. Thus, the rejection of these claims is now moot. Claims 1-38 and 41-44 are therefore not anticipated nor rendered obvious and are in condition for allowance over the prior art references.

CONCLUSION

It is respectfully submitted that each of the presently pending claims (Claims 1-38 and 41-44) is in condition for allowance and notification to that effect is requested. Examiner is invited to contact the Applicant's representative at the below-listed telephone number if it is believed that the prosecution of this application may be assisted thereby. Although only certain arguments regarding patentability are set forth herein, there may be other arguments and reasons why the claimed invention is patentable. Applicant reserves the right to raise these arguments in the future.

Dated: October 10, 2007

Respectfully submitted,


BY _____

John W. Branch

Registration No.: 41,633

DARBY & DARBY P.C.

P.O. Box 770

Church Street Station

New York, New York 10008-0770

(206) 262-8906

(212) 527-7701 (Fax)

Attorneys/Agents For Applicant